

EXHIBIT 1

From: [Alladi, Om V.](#)
To: [Hinger, Cathy](#); [Nemith, Mike](#); [Baker, Jeremy](#); [Gallagher, Katie](#); audley@chapman.com; [Bruno, Victoria](#); dandrea@chapman.com; [Weaver, Kurt](#); [Carter, David](#)
Cc: [Mervis, Michael T.](#); [Vinti, Baldassare](#); [Roche, Jennifer L.](#); [Gordon, Amy B.](#); john.hamill@dlapiper.com; joe.carey@dlapiper.com; devin.carpenter@dlapiper.com; michael.pullos@dlapiper.com
Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. et al - Request to meet and confer
Date: Monday, November 7, 2022 8:05:31 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

External (oalladi@proskauer.com)

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Cathy, please see our responses interlineated in your email below:

Om V. Alladi

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From: Hinger, Cathy <Cathy.Hinger@wbd-us.com>

Sent: Thursday, November 3, 2022 6:04 PM

To: Alladi, Om V. <OAlladi@proskauer.com>; Nemith, Mike <Mike.Nemith@wbd-us.com>; Baker, Jeremy <Jeremy.Baker@wbd-us.com>; Gallagher, Katie <Katie.Gallagher@wbd-us.com>; audley@chapman.com; Bruno, Victoria <Victoria.Bruno@wbd-us.com>; dandrea@chapman.com; Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Carter, David <David.Carter@wbd-us.com>

Cc: Mervis, Michael T. <MMervis@proskauer.com>; Vinti, Baldassare <BVinti@proskauer.com>; Roche, Jennifer L. <jroche@proskauer.com>; Gordon, Amy B. <AGordon@proskauer.com>; john.hamill@dlapiper.com; joe.carey@dlapiper.com; devin.carpenter@dlapiper.com; michael.pullos@dlapiper.com

Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. et al - Request to meet and confer

This email originated from outside the Firm.

Dear Om,

I am writing in response to your request for a meet and confer.

As we have discussed before, Plaintiffs' damages methodologies will be dependent on data and information they are seeking from the Defendants, in particular CDR

data, and we have cited authorities on these issues previously. However, if we can reach a date certain for production of Inteliquent's first sample, we would have some sort of timeline to work with. Therefore, we believe it would be beneficial to have this conversation together with Inteliquent. We do not agree that Plaintiffs are excused from disclosing their damages calculations for the reason you state or any other reason. That said, as Mike has already told you, we are willing to meet and confer with you and Inteliquent's counsel. We are available this afternoon or at various times on Wednesday.

We also have a number of issues about which we would like to meet and confer. First, Plaintiffs served a letter on TMUS counsel on October 21, 2022 concerning deficiencies with TMUS's RFA responses and requesting a meet and confer by October 27, 2022. 13 days have now passed without TMUS providing dates for the meet and confer we requested. Plaintiffs had TMUS's RFA responses for 81 days before sending their October 21 letter. We have reviewed and analyzed the letter and are preparing a response. Katie Gallagher also sent TMUS counsel an email on October 27, 2022 asking about when TMUS will produce its documents in response to the Second Set of Request for Production, and while we did subsequently receive a production, TMUS has provided no substantive response concerning a production schedule, nor has it responded to her queries about the status of TMUS's privilege log. Our document review is ongoing and further productions will be made in due course. We have responded to Katie's queries regarding privileged documents.

This is precisely the sort of delay that has caused me to propose, several times, an agreement that the parties respond to meet and confer requests and schedule dates within five business days. I would like to revisit that proposal again on our next call, in addition to meeting and conferring about the Defendants' position on jointly requesting appointment of a Special Master to help facilitate resolution of discovery disputes. TMUS still does not agree to the proposal you already made. TMUS also does not believe there is any need for a special master. That said, we are, as always, willing to meet and confer.

Next, there are also deficiencies with TMUS's responses to Plaintiffs' Interrogatories and Second Set of Requests for Production of Documents we would like to discuss with TMUS in the next meet and confer as well. I will be providing you summaries of those issues to facilitate discussion on those issues. On Friday evening we received two 10-page, single-spaced letters from you. Presumably they cover these topics. We will review them and respond in due course, after which we can schedule a meet and confer.

Given the number of outstanding discovery issues, I suggest we schedule a global in person meet and confer on all of these issues when counsel for all parties are together in Chicago at the Courthouse next Monday following our status conference. We should be able to reach an agreement on the preliminary CDR sample with Inteliquent on Monday if Inteliquent – the remaining issue in dispute is very narrow. If we cannot reach consensus on the first part of the CDR sampling plan in person on Monday, ***then we propose Tuesday for a follow up call with Inteliquent and its CDR custodians and Plaintiffs along with their CDR technology consultants (who are available on Tuesday)*** as required by Judge Coleman's procedures before motions practice. To the extent the second meeting is necessary, we invite TMUS to participate in the meeting on Tuesday with the CDR technical support to better inform the timeline on CDR production that in turn relates to damages analysis. As noted in our prior correspondence and above, we would like to meet and confer with you regarding Plaintiffs' deficient initial disclosures and are willing to talk about that at the same time we meet and confer with Inteliquent's counsel regarding CDR issues, notwithstanding that we do not believe there is necessarily a linkage between the two.

Please let us know whether all Defendants will participate in a global meet and confer to review all of these outstanding issues following the hearing on Monday. We can host the meet and confer at Chapman's offices, or we defer to the local counsel on

whether there are publicly available attorney rooms in the Courthouse that are now open for counsel to use.

We think the Court would appreciate knowing on Monday that we are attempting to use the opportunity to come together to help advance the progress of the case.

Also, given that there is no court ordered agenda for the status conference on Monday, tomorrow we plan to file a very short notice pursuant to the confidentiality agreement that we may need to address information that is confidential in the hearing to the extent we receive questions from the Court that require disclosure of confidential information, or to the extent it is necessary to respond to any points raised by Defendants.

Best Regards,

Cathy Hinger

Cathy Hinger

Partner

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From: Alladi, Om V. <OAlladi@proskauer.com>

Sent: Thursday, November 3, 2022 12:02 PM

To: Hinger, Cathy <Cathy.Hinger@wbd-us.com>; Nemith, Mike <Mike.Nemith@wbd-us.com>; Baker, Jeremy <Jeremy.Baker@wbd-us.com>; Gallagher, Katie <Katie.Gallagher@wbd-us.com>; audley@chapman.com; Bruno, Victoria <Victoria.Bruno@wbd-us.com>; dandrea@chapman.com; Weaver, Kurt <Kurt.Weaver@wbd-us.com>; Carter, David <David.Carter@wbd-us.com>

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Subject: RE: Craigville Telephone Co. et al v. T-Mobile USA, Inc. et al - Request to meet and confer

Counsel,

One correction to my email below: TMUS seeks a meet and confer regarding its Third Set of RFPs (not Second). Apologies if this caused any confusion. Please let us know when Plaintiffs are available to discuss.

Thanks,
Om

Om V. Alladi

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From: Alladi, Om V.

Sent: Monday, October 31, 2022 10:54 AM

To: 'Cathy.Hinger@wbd-us.com' <Cathy.Hinger@wbd-us.com>; 'Mike.Nemith@wbd-us.com' <Mike.Nemith@wbd-us.com>; 'Jeremy.Baker@wbd-us.com' <Jeremy.Baker@wbd-us.com>; 'Katie.Gallagher@wbd-us.com' <Katie.Gallagher@wbd-us.com>; 'audley@chapman.com' <audley@chapman.com>; 'Victoria.Bruno@wbd-us.com' <Victoria.Bruno@wbd-us.com>; 'dandrea@chapman.com' <dandrea@chapman.com>; 'Kurt.Weaver@wbd-us.com' <Kurt.Weaver@wbd-us.com>; 'David.Carter@wbd-us.com' <David.Carter@wbd-us.com>
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Subject: Craigville Telephone Co. et al v. T-Mobile USA, Inc. et al - Request to meet and confer

Counsel,

We write to schedule a meet and confer concerning (i) Plaintiffs' objections and responses to TMUS's Second Set of RFPs, and (ii) Plaintiffs' continuing, inexcusable failure to amend their initial disclosures to provide "a computation of each category of damages claimed by" Plaintiffs and Plaintiffs' evidentiary support for them.

On Plaintiffs' responses to TMUS's RFPs, we do not understand whether or not Plaintiffs are withholding documents on the basis of their objections. Additionally, several of Plaintiffs' assertions in their lengthy objections and responses are questionable and we would like to understand the bases for them.

On Plaintiffs' initial disclosures, it is long past time for them to be amended. Without such disclosures, TMUS will not have sufficient opportunity to conduct discovery on Plaintiffs' damages claims. We would like to make one last attempt to persuade Plaintiffs to comply with their obligations in this regard.

Please let us know your availability for a call this week or next week to discuss the above.

Thanks,
Om

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